

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PASSPORT INTERNATIONAL	:	
ENTERTAINMENT, LLC, a California	:	
Limited Liability Company,	:	
	:	
Plaintiff,	:	Civil Action No. 07 Civ 8194 (VM)
	:	
-against-	:	NOTICE OF MOTION
	:	TO DISMISS
HISTORIC FILMS ARCHIVE, LLC, a New	:	
York Limited Liability Company,	:	
	:	
Defendant.	:	
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C O U N S E L:

PLEASE TAKE NOTICE that upon the accompanying Declaration of K. Luan Tran, dated December 18, 2007, the Affirmation of Donna M. Bates, dated December 19, 2007, the Memorandum of Law and all the pleadings and proceedings heretofore had herein, defendant Historic Films Archive, LLC shall move this Court before the Honorable Victor Marrero on February 8, 2008, at the United States Courthouse located at 500 Pearl Street, New York, New York, at 10:00 in the forenoon, or as soon thereafter as counsel may be heard, for an order pursuant to Rules 12(b) (6) of the Federal Rules of Civil Procedure, dismissing plaintiff's complaint in its entirety, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 6.1 (b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, answering papers, if any, are required to be served within ten business days after service of the moving papers.

Dated: New York, New York
December 20, 2007

Respectfully submitted,

ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK, P.C.

By: 

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